





5. The Circuit Court of Richland County is located within the District of South Carolina. Accordingly, removal to this Court satisfies the venue requirements of 28 U.S.C. § 1446(a).

6. Plaintiff, Megan Thomas is a citizen of the State of South Carolina and a resident of Kershaw County, South Carolina. (Complaint ¶ 1; Exhibit A)

7. Defendant, City of Columbia is a municipality located in Richland and Lexington Counties, South Carolina.

8. This Court has original subject matter jurisdiction over this action as to the Defendant, pursuant to 28 U.S.C. § 1441(a) and 28 U.S.C. § 1443(2) insofar as Plaintiff alleges violations of federal law.

9. A copy of the written notice required by 28 U.S.C. § 1446(d) is attached as Exhibit B and is being filed in the Circuit Court for Richland County, South Carolina and served on the Plaintiff.

NICKLES LAW FIRM, LLC

By: s/W. Allen Nickles, III  
W. Allen Nickles, III, Fed. ID No. 2541  
1122 Lady Street, Suite 610  
Columbia, South Carolina 29201  
(803) 779-8080

*Attorney for Defendant*

Columbia, South Carolina  
October 5, 2017